

June 27, 2011

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Structure and Practices of the Video Relay Service Program,*  
CG Docket No. 10-51

Dear Ms. Dortch:

On June 23, 2011, I spoke with Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis, regarding the above-captioned docket. Consistent with Sorenson's Comments at 23-24 (filed August 18, 2010) and Reply Comments at 12-13 (filed September 2, 2010), I discussed reverse auction structures. There are a number of auction structures that could create incentives for providers to bid vigorously, and in any event any auction could be backstopped by a reserve price to safeguard the TRS fund. In addition, the prospect of entry by others, either at the time of the auction or after, could be used to create market discipline on VRS rates.

A copy of this letter is being filed in the above-referenced dockets.

Sincerely,



John T. Nakahata  
*Counsel to Sorenson Communications, Inc.*

cc: Paul de Sa